

32802-49

12/18/2000

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

December 18, 2000

Ms. Janet P. Baguhn  
Howard Johnson's Enterprises, Inc.  
700 W. Virginia Street #222  
Milwaukee, WI 53204-1548

Subject: Response to Chlorpyrifos MOU dated June 7, 2000  
Dursban 100 Granules  
EPA Registration Number 32802-49  
Submission dated August 30, 2000

Dear Ms. Baguhn:

The revised labeling referenced to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) as amended, is acceptable, provided you incorporate the Agency's conditions as enumerated in this letter below and submit one copy of your final printed label prior to releasing the product for shipment.

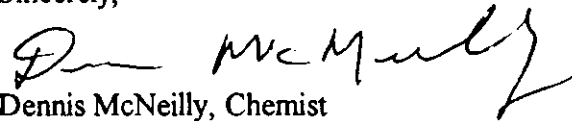
- 1) The label must be revised to clearly state that this product can be used on "golf course turf only."
- 2) The text "for complete control of fleas and ticks, pets should be treated with an EPA-approved product labeled for direct use on pets" must be deleted from the label.

3). Add "maximum application rate is 1 lb. ai per acre" to the directions for use.

Submit one copy of the revised final printed label before releasing the product for shipment. If the conditions enumerated above are not complied with, the registration will be subject to cancellation in accordance with FIFRA Section 6(e).

A stamped copy of the label is enclosed for your records. If you have questions about this label review, please contact me at (703) 308-6742 or electronically at [McNeilly.Dennis@EPA.gov](mailto:McNeilly.Dennis@EPA.gov). You may also contact Judy Loranger at (703) 308-8056 if you have specific questions regarding this letter.

Sincerely,



Dennis McNeilly, Chemist  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure: stamped label

# DURSBAN 100 GRANULES

GOLF COURSE TURF INSECT CONTROL

KILLS INSECTS WHICH DAMAGE GOLF COURSE TURF

CONTROLS SURFACE FEEDING INSECTS AND  
ROOT FEEDING INSECTS

READY-TO-USE GRANULE EASY TO USE GRANULES

CONTAINS DURSBAN INSECTICIDE

FOR LONG LASTING INSECT CONTROL

USE THROUGHOUT THE SEASON

### ACTIVE INGREDIENT:

Chlorpyrifos: [O,O-Diethyl O-(3,5,6-trichloro-2-pyridinyl) phosphorothioate] . . . . . 1.0%

INERT INGREDIENTS: . . . . . 99.0%

TOTAL: . . . . . 100.0%

EPA Reg. No. 32802-49

EPA Est. No. 32802-WI-1 (A), 32802-MO-1 (B)

First letter of bag code shows establishment where manufactured.  
Manufactured by:

**HOWARD JOHNSON'S ENTERPRISES, INC.**  
700 W. Virginia Street, Milwaukee, WI 53204-1548

NET WEIGHT: 25 lb (or 36, 40 or 50 lb)

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. Do not use this product indoors.

**FOR GOLF COURSE TURF:** Apply insecticide granules uniformly over the turf using any spreader designed for application of granular materials. Contact your Agricultural Extension Service for the best time to treat for specific insect pests in your area.

**For control of surface feeding insects:**  
Controls ants, armyworms, beetles, billbugs, boxelder bugs, brown dog ticks, chiggers, chinch bugs, clover mites, crickets, cutworms, deer ticks, earwigs, fleas, grasshoppers, millipedes, sowbugs (pillbugs), sod webworms (lawn moth), spiders. Apply 2.3 pounds per 1000 square feet (100 pounds per acre). Treat in spring or as soon as insects become a problem, and repeat as needed for control. For complete control of fleas and ticks, pets should be treated with an EPA-approved product labeled for direct use on pets.

**For control of root feeding insects:**  
To control white grubs (larvae of Japanese beetle, black turfgrass ataenius, European chafer, southern masked chafer): Apply 2.3 pounds per 1000 square feet (100 pounds per acre). For best results, water treated area thoroughly (1/2 to 1 inch of water) to move insecticide into the soil. For heavy grub infestations, a repeat treatment of 2.3 pounds per 1000 square feet (100 pounds per acre) may be made 7 to 14 days after initial treatment. Treat when grubs are young and actively feeding near soil surface in mid-July and early August.

To control turfgrass weevil (larvae of Hyperodes weevil): Apply 2.3 pounds per 1000 square feet (100 pounds per acre) in mid-April and again in mid-May at the same rate as above.

To control european crane fly (leather jacket): Apply 2.3 pounds per 1000 square feet (100 pounds per acre). For best results, water treated area thoroughly (1/2 to 1 inch of water) to move insecticide into the soil.

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION:** See (back or side) panel for additional precautionary statements and first aid information

**PRECAUTIONARY STATEMENTS**  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
**CAUTION:** May be harmful if swallowed. Avoid breathing dust. Avoid contact with eyes and skin. Wash thoroughly after handling. Wash contaminated clothing before reuse. Keep away from food, feedstuffs and domestic water supplies.  
**FIRST AID**  
**IF SWALLOWED:** Call a physician or poison control center. Induce vomiting by giving person 1 or 2 glasses of water and touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.  
**IF INHALED:** Remove person to fresh air. Apply artificial respiration if indicated. Get medical attention immediately.  
**IF ON SKIN:** Remove contaminated clothing and wash thoroughly with soap and water.  
**IF IN EYES:** Flush eyes with plenty of water. Get medical attention if irritation persists. Note to Physician: This insecticide is a cholinesterase inhibitor. Treat symptomatically. Atropine, by injection only, is an antidote.  
**ENVIRONMENTAL HAZARDS:** This product is toxic to fish, birds and other wildlife. Do not apply when weather conditions favor drift from treated area. Do not feed treated grass clippings to livestock. Do not contaminate water when disposing of equipment washwaters. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

**ACCEPTED**  
**SPREADER SETTINGS** to apply with **COMMENTS** 1000 square feet  
**In EPA Letter Dated:**  
DEC 18 2000  
**Under the Federal Insecticide, Fungicide, and Rodenticide Act,**  
**as amended for the pesticide**  
**labeled under EPA Reg. No.**  
*(This chart may contain additional product, use, and spreader settings, and instructions for spreader use and calibration.)*

**STORAGE AND DISPOSAL**  
Do not contaminate water, food or feed by storage or disposal.  
**STORAGE:** Store in original container in a locked storage area out of reach of children and domestic animals.  
**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.  
**CONTAINER DISPOSAL:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**GUARANTEE:** This product is unconditionally guaranteed.

*(Alternate wording for warranty statement:)*

**GREEN GUARANTEED:** Your satisfaction is guaranteed when this product is used in accordance with instructions. Of product performance is less than satisfactory, seller will refund the full purchase price with evidence of purchase.

*(Alternate wording for warranty statement:)*

**NOTICE:** Buyer and user assumes all risks and liability of use, storage and/or handling of this product not in accordance with the terms of this label.

*(Alternate wording for warranty statement:)*

**WARRANTY AND DISCLAIMER:** Manufacturer/seller warrants that this product conforms to the ingredient statement on the label, and that the product is reasonably suited for the labeled use when applied according to directions. Buyer and user assumes all risks and liability of use, storage and/or handling of this product not in accordance with the terms of this label. Manufacturer/seller makes no other warranty, expressed or implied, and shall not be liable for indirect or consequential damages.

*(Alternate wording for warranty statement:)*

**WARRANTY AND DISCLAIMER:** Manufacturer/seller warrants that this product conforms to the ingredient statement on the label, and that the product is reasonably suited for the labeled use when applied according to directions. Buyer and user assumes all risks and liability of use, storage and/or handling of this product not in accordance with the terms of this label. No other warranty, expressed or implied, is made concerning the merchantability or fitness for a particular purpose. Manufacturer/seller's liability shall be limited to the purchase price of the product. In no case shall manufacturer/seller be liable for consequential or incidental damages or loss.

*(Alternate wording for warranty statement:)*

**NOTICE:** Manufacturer/seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with the use of this product. Plant injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of manufacturer/seller. In no case shall manufacturer/seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the buyer. Except as expressly provided, manufacturer/seller makes no other warranties or representations, expressed or implied, or by usage of trade, statutory or otherwise, including, but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage. Buyer's or user's exclusive remedy for loss or damage resulting from this product shall be limited to the cost of the product.